

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

RowVaughn Wells, Individually and as)	
Administratrix of the Estate of Tyre Deandre)	
Nichols, Deceased,)	
)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 2:23-CV-02224-MSN-atc
)	JURY DEMAND
The City of Memphis, Tennessee; Chief Cerelyn)	
Davis; Emmitt Martin III;)	
Demetrius Haley; Justin Smith;)	
Desmond Mills, Jr.; Tadarrius Bean;)	
Preston Hemphill; Robert Long;)	
JaMichael Sandridge; Michelle Whitaker;)	
DeWayne Smith,)	
)	
Defendants.)	

NOTICE OF REQUEST FOR HEARING ON PENDING MOTIONS

Defendants the City of Memphis (the “City”) and Chief Cerelyn Davis in Her Individual Capacity (“Chief Davis”), pursuant to Local Rule 7.2(d), hereby respectfully request a hearing on the following motions which are pending before this Court:

- **ECF No. 211** - Plaintiff’s Motion for Protective Order
- **ECF Nos. 234, 235** – Plaintiff’s Motion to Seal Portions of City’s Filing (ECF No. 230) That Risk Harming Minor Child
- **ECF No. 286** – The City’s Motion to Vacate Plaintiff’s Improper Confidentiality Designations
- **ECF No. 303** – The City’s Motion to Dismiss Plaintiff’s First Amended Complaint
- **ECF No. 348** – Chief Davis’s Motion for Protective Order
- **ECF No. 383** – The City’s Motion to Compel Production of Documents Pursuant to

City's Subpoenas *Duces Tecum* Propounded to Rodney Wells, Keyana Dixon, and Lenge Dupree

- **ECF No. 409** – Chief Davis's Motion to Quash Subpoena
- **ECF No. 412** – The City's Motion for Sanctions Against Plaintiff
- **ECF No. 422** – The City's Motion for Protective Order

Under the Third Amended Scheduling Order, written discovery is scheduled to be completed on July 12, 2025. (ECF No. 276.) The fact discovery period closes on August 29, 2025. (*Id.*) Resolution of the above motions is necessary for fulsome completion of discovery.

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

/s/ Bruce McMullen

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*Attorneys for Defendant City of Memphis,
Chief Cerelyn Davis in her Individual
Capacity, and Dewayne Smith as Agent of
the City of Memphis*

CERTIFICATE OF SERVICE

I, Bruce McMullen, hereby certify that on June 17, 2025, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, and that upon filing, such system will serve a copy of the foregoing upon all counsel of record in this action.

s/ Bruce McMullen

Bruce McMullen